

December 20th, 2012

Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Comment Filing Proceeding Number: 11-49

The purpose of this letter is to serve as a public comment filing for Public Notice 11-49, Test Results for Progeny Licensed M-LMS 900 Mhz equipment deployment.

After reviewing the published test results performed for the deployment of a Licensed M-LMS system in the 900 Mhz unlicensed band, we have determined that these products would be extremely detrimental to our network. Although there were several pieces of information from the test which showed this to be true, it only takes one subtest to fail, to fail the entire test. Below is one test chart which shows we would effectively lose our bandwidth in just one channel tested.

Our Wireless Internet Service Provider network, for four counties in Virginia, due to terrain, at this time requires heavy reliance on the 900MHz band. This band is what we have to deploy in order to provide true broadband... speeds up to 15Mbps. We use exclusively Ubiquiti products for unlicensed bands. The deployment of the Progeny M-LMS system in our area would destroy what is the only broadband for these rural communities outside of Satellite and 3G cellular.

Sincerely,

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Clay Stewart - CEO, Stewart Computer Services

Attachment

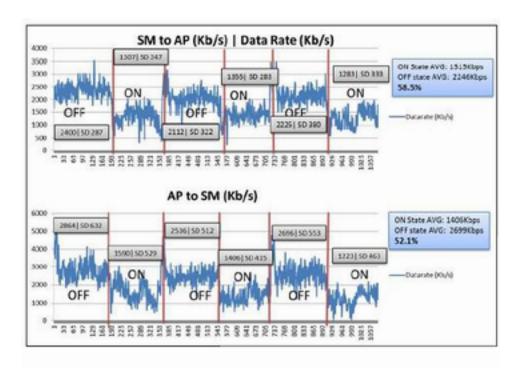


Figure 16: Ubiquiti 917 MHz (Tests 9-10)